Case 2:05-c)-20335-JPM Document 13 Filed 12/07/05 Page 1 of 3

UNITED STATES DISTRICT COURT

- POR THE WESTERN DISTRICT OF TENNESSEE WESTERN DIVISION

1PM 3: 48 05 DEC -7

UNITED STATES OF AMERICA.

Plaintiff.

KENDRIX RYAN,

Defendant.

FILED BY

Case No. 2:05cr20335-Ml

VS.

MOTION GRANTED

JON PHIERS

U.S. DISTRICT JUNE

12/7/05

MOTION FOR LEAVE TO FILE ADDITIONAL MOTIONS

Now comes Defendant, through the undersigned counsel, moves the Court to permit the filing of additional motions in this matter.

Counsel for Defendant has filed those motions believed to be necessary in order to protect the interests of the Defendant in this case. Counsel will continue their responsibilities to investigate the factual aspects of this case, to complete the discovery process which is not yet completed, to research the issues involved, and otherwise provide effective assistance of counsel to Defendant.

The filing of additional motions may be necessary once rulings have been made on the pending motions and in order to adequately provide effective assistance of counsel to which Defendant is entitled under the Tennessee and United States Constitution.

This motion is not made for the purpose of delay or for any other improper reasons, but simply to adequately represent Defendant.

Defendant moves for a hearing on this motion.

Respectfully submitted,

Larry E. Copeland, Jr., #0186

Attorney for Defendant 138 N. Third St., 2nd Floor

Memphis, TN 38103

901-526-0898

d on the docket sheet in J2(b) FROrP on 128-05

This court with Pulls

CERTIFICATE OF SERVICE

I, Larry E. Copeland, Jr., hereby certify that a true and exact copy of the foregoing has been hand delivered, mailed postage prepaid, to Ms. Valeria Rae Oliver, Assistant U.S. Attorney, 167 N. Main St., Suite 800, Memphis, TN 38103, this day of 2005.

Larry E. Copeland, J



Notice of Distribution

This notice confirms a copy of the document docketed as number 13 in case 2:05-CR-20335 was distributed by fax, mail, or direct printing on December 8, 2005 to the parties listed.

Valeria Rae Oliver U.S. ATTORNEY'S OFFICE 167 N. Main St. Ste. 800 Memphis, TN 38103

Larry E. Copeland OZMENT COPELAND & HAYS 138 N. Third St. 2nd Floor Memphis, TN 38103

Honorable Jon McCalla US DISTRICT COURT